

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. NO. 03-12635-MLW

JOHN SANCES and KENNETH SANCES, )  
Individually and in their capacity )  
as TRUSTEES OF THE 305 UNION STREET )  
REALTY TRUST, )  
Plaintiffs, )

v. )

TOWN OF HOLBROOK, GEORGE JAMESON, )  
JOHN CALLAHAN, JOHN PAPP, CLIFF )  
JACOB and JACK CULHANE, individually )  
and as members of the Holbrook )  
Planning Board, and DANIEL MORIARTY, )  
individually and as Building )  
Inspector for the Town of Holbrook, )  
Defendants. )

PLAINTIFFS' OPPOSITION TO INDIVIDUAL DEFENDANTS' MOTION FOR  
JUDGMENT ON THE PLEADINGS

Now come the Plaintiffs, John Sances and Kenneth Sances individually and in their capacities as Trustees of the 305 Union Street Realty Trust and hereby file an Opposition to the Individual Defendant's Motion for Judgment on the Pleadings and in support thereof rely on the accompanying Memorandum.

WHEREFORE, the Plaintiffs respectfully requests that this court not dismiss any of the claims filed against the Individual Defendants.

UNION STREET REALTY TRUST  
By its attorneys,

Handwritten signature of Gary S. Brackett in cursive script, with a horizontal line drawn across the signature.

Gary S. Brackett  
BBO# 052940  
Ellen Callahan Doucette  
BBO# 542294  
BRACKETT & LUCAS  
19 Cedar Street  
Worcester, MA 01609  
508-799-9739